

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

58.6748

**JOSE ENCARNACION and CECILIA
MORAN, Individually and as Husband and
Wife,**

Plaintiffs,

VS.

NO.

**HEARTLAND EXPRESS, INC. OF IOWA
d/b/a HEARTLAND EXPRESS and
STEVEN SMITH,**

Defendants.

NOTICE OF REMOVAL

The Defendant, Heartland Express, Inc. of Iowa d/b/a Heartland Express, by and through counsel, files this Notice of Removal pursuant to 28 U.S.C. §1446. The Defendant would show to the Court that there is complete diversity of citizenship among the parties. The Defendant would also show to the Court that the amount in controversy exceeds the Court's minimum threshold as the Complaint alleges that the Plaintiff incurred medical bills of approximately \$191,000.00.

Respectfully submitted,

**McNABB, BRAGORGOS, BURGESS &
SORIN, PLLC**

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CERTIFICATE OF SERVICE

This certifies that on the Friday, April 1, 2019a true and correct copy of the foregoing document has been served upon opposing counsel for all parties or all parties individually by electronic means through the Court's Electronic Filing System and/or via first-class U.S. Mail, postage prepaid, as follows:

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